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Attorneys for Plaintiff  
VIOLET BLUE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

VIOLET BLUE, an Individual,  
Plaintiff,

v.

ADA MAE JOHNSON a/k/a ADA  
WOFFINDEN, an individual d/b/a  
VIOLET BLUE a/k/a VIOLET a/k/a  
VIOLET LUST; VIOLET BLUE, INC., a  
California Corporation; and DOES 1-10,  
Defendants.

Case No. C 07-5370 SI

**DECLARATION OF COLETTE VOGELE  
IN SUPPORT OF PLAINTIFF BLUE'S  
MOTION FOR PRELIMINARY  
INJUNCTION**

Hon. Judge Illston  
Courtroom 10, 19th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

**Hearing Date: May 9, 2008  
Hearing Time: 9:00 a.m.**

I, Colette Vogeles, declare as follows:

1. I am a member of the State Bar of California, admitted to practice before this Court, founding attorney of Vogeles & Associates, and attorney of record for movant Violet Blue herein. The facts contained in this declaration are known personally to me and, if called as a witness, I could and would testify competently thereto under oath.

2. Attached hereto as Exhibit A is a true and correct copy of Defendant Woffinden's Initial Disclosures pursuant to FED. R. CIV. P. 26(a) which, despite that erroneous Declaration of Service attached to the document, were received by my offices on January 25, 2008 by a email

1 from Defendant's counsel, Robert Apgood.

2 3. Attached hereto as Exhibit **B** is a true and correct copy of the first Office Action  
3 issued during the prosecution of the VIOLET BLUE trademark, Reg No. 3,391,010, dated June  
4 15, 2007.

5 4. Attached hereto as Exhibit **C** is a true and correct copy of the second Office  
6 Action issued during the prosecution of the VIOLET BLUE trademark, Reg No. 3,391,010, dated  
7 November 1, 2007.

8 5. Attached hereto as Exhibit **D** is a true and correct copy of the box cover for the  
9 film "SMUT 14," released in 1999, depicting a Latina actress promoted as "Violet Blue." In the  
10 film, however, the actress introduces herself as merely "Violet." In any event, the actress is not  
11 Defendant Woffinden, and to my knowledge Defendant Woffinden does not appear anywhere in  
12 this film, SMUT 14.

13 6. Attached hereto as Exhibit **E** is a true and correct copy of a website showing the  
14 availability for sale of the film "Nina Hartley's Guide To Great Sex During Pregnancy,"  
15 featuring "Violet Blue."

16 I declare under penalty of perjury under the laws of the State of California that the  
17 foregoing is true and correct. Executed this 25th day of April, 2008, at San Francisco, California.

18  
19 /S/

20 Colette Vogeles  
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